REMARKS

Reconsideration of this Application is respectfully requested.

Upon entry of the foregoing amendment, claims 1-16 and 21-24 are pending in the application, with claims 1 and 21 being the independent claims. These changes are believed to introduce no new matter, and their entry is respectfully requested.

Based on the above Amendment and the following Remarks, Applicants respectfully request that the Examiner reconsider all outstanding rejections and that they be withdrawn.

Rejections under 35 U.S.C. § 101

In the Action on pages 3-4, section 4, claim 1 is rejected under 35 U.S.C. § 101 as being directed to non-statutory subject matter. Applicants respectfully traverse the rejection.

Claim 1 is amended to recite a computer-implemented method and include a step that manipulates data. In light of the Ex parte Lundgren decision, there is no "technological arts" test to patentability. Applicants therefore respectfully request that the rejection of claim 1 and dependent claims 2-16 be withdrawn.

Rejections under 35 U.S.C. § 103

In the Action on pages 4-11, section 5, Claims 1-5, 8-14, 16 and 21-24 are rejected under 35 U.S.C. § 103(e) as being anticipated by U.S. Patent No. 5,339,247 to Kirihara et al. (hereinafter, "Kirihara"), and Applicants' admitted prior art ("AAPA"). Claims 2 and 5 are canceled, rendering their rejection moot. Applicants respectfully traverse the rejection of the remaining claims.

As amended, claim 1 incorporates the subject matter of canceled claims 2 and 5, and recites a computer-implemented method of managing physical-file-based data adapted to be manipulated via a file-based computerized editor, wherein the physical-file-based data includes a physical file having a plurality of file elements, the method comprising the steps of: (a) ***representing the physical-file-based data as a plurality of individual components,*** each individual component having a unique identity and identifier, wherein said individual components are adapted to be manipulated by a transaction-based computerized editor; (b) storing said individual components in a store, ***wherein all of said individual components corresponding to one physical file of said***

physical-file-based data are stored in a single store, and said single store contains no individual components of a different physical file of said physical-file-based data; and (c) ***recreating equivalent physical-file-based data for use within an environment of a physical-file-based computerized editor from said individual components in said store.*** The Action on page 5 admits that Kirihara fails to teach managing physical-file-based data adapted to be manipulated via a file-based computerized editor; wherein said individual components are adapted to be manipulated by a transaction-based computerized editor. Applicants agree that Kirihara fails to teach this element. In addition, Kirihara fails to teach at least three other elements of claim 1. AAPA does not supplement Kirihara to teach or suggest the missing claim elements. Therefore, the Action fails to set forth a *prima facie* case of obviousness regarding claim 1.

First, Kirihara fails to teach **representing the physical-file-based data as a plurality of individual components**. Instead, Kirihara teaches the use of "parts," which are not equivalent to components. The parts of Kirihara, while not specifically defined, may contain child parts. See, e.g., Kirihara, FIG. 3. In contrast, a component, as defined in the specification, is the "smallest unit of interchange in the system. ... However, components differ from objects in that components also have a set of names and data types that define each data value (collectively, a "field"), [and] a program that can interpret and modify the fields (a "class")." Specification, paragraph 48. Therefore, Kirihara does not teach components and cannot teach representing the physical-file-based data as a plurality of individual components.

Second, Kirihara fails to teach storing said individual components in a store, wherein **all** of said individual components corresponding to one physical file of said physical-file-based data are stored in a **single** store, and said single store contains no individual components of a different physical file of said physical-file-based data. Instead, Kirihara teaches dividing parts information into at least two different files: a parts shape file and a parts construction file. Further, the parts shape files may be distributed, with different files containing information for different parts. Each construction file is composed of separate tables of data. See, e.g., Kirihara, col. 4, lines 3-6, 12-13. In contrast, the method of claim 1 stores all components from one physical file in a single store. Therefore, Kirihara fails to teach storing said individual components in a store, wherein all of said individual components corresponding to one physical file of said physical-file-based data are stored

in a single store, and said single store contains no individual components of a different physical file of said physical-file-based data.

Third, as stated in the Action at the bottom of page 6 regarding claim 5, Kirihara fails to teach **recreating equivalent physical-file-based data for use within an environment of a physical-file-based computerized editor from said individual components in said store**. Kirihara has no teachings of recreating equivalent physical-file-based data from components in a store. Therefore, Kirihara fails to teach at least three additional elements of claim 1.

Further, AAPA fails to overcome the deficiencies of Kirihara, alone or in combination. The AAPA cited in the Action discusses the desirability of being able to use the traditional physical-file-based computerized editors. However, paragraph 11, cited by the Action, describes ModelServer Continuum, which uses a single database to represent **all** elements from **all** models in **a single relational database**. AAPA also discusses the drawbacks of using such an approach. There is no mention in AAPA of any of the claim elements discussed above and missing from Kirihara. Therefore, AAPA does not supplement Kirihara or teach or suggest the claimed invention.

Further, the motivation to combine the references is missing. Kirihara teaches the use of **a relational database** to store parts construction data. See Kirihara col. 4, lines 4-6. AAPA paragraph 11 teaches **the disadvantages of using a relational database** to store elements of design models. Consequently, one of ordinary skill in the art would not be prompted to combine Kirihara with AAPA . In any event, such a combination would not yield a method as claimed in claim 1 as discussed above.

Claims 2-4, 8-14, and 16 depend from claim 1 and are allowable as being dependent on an allowable claim.

Claim 21, as amended, recites similar limitations as claim 1, and is allowable for at least the reasons given above for claim 1.

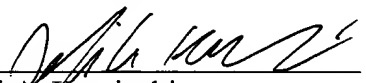
Claims 22-24 depend from claim 21 and are allowable as being dependent on an allowable claim.

Conclusion

All of the stated grounds of rejection have been properly traversed, accommodated, or rendered moot. Applicants therefore respectfully request that the Examiner reconsider all presently outstanding rejections and that they be withdrawn. Applicants believe that a full and complete reply has been made to the outstanding Office Action and, as such, the present application is in condition for allowance. If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is hereby invited to telephone the undersigned at the number provided.

Dated: December 8, 2005

Respectfully submitted,

By 

Jeffri A. Kaminski
Registration No.: 42,709
VENABLE LLP
P.O. Box 34385
Washington, DC 20043-9998
(202) 344-4000
(202) 344-8300 (Fax)
Attorney/Agent For Applicant

::ODMA\PCDOCS\DC2DOCS1\698972\1